



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II**

IN THE MATTER OF:

Cornell-Dubilier Electronic Site
South Plainfield, New Jersey

D.S.C. of Newark Enterprises, Inc.,

Respondent

ADMINISTRATIVE ORDER

U.S. EPA Region II

Index No: II CERCLA-97-0109

Proceeding Pursuant to §106(a) of the
Comprehensive Environmental Response,
Compensation, and Liability Act of 1980, as
amended, 42 U.S.C. §9606(a).

I. JURISDICTION

This Administrative Order ("ORDER") is issued to the above-captioned Respondent pursuant to the authority vested in the President of the United States under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9606(a), which authority was delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, dated January 23, 1987, and further delegated to the Regional Administrator of EPA, Region II. Notice of this Order has been provided to the New Jersey Department of Environmental Protection pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

II. DEFINITIONS

A. As used in this ORDER, unless the context clearly requires some other meaning, the following terms shall have the following meanings:

1. "EPA" shall mean the United States Environmental Protection Agency.
2. "Respondent" means D.S.C. of Newark Enterprises, Inc., a corporation incorporated in the State of New Jersey and having its principal place of business located at Hamilton Industrial Park, 333 Hamilton Boulevard, South Plainfield, Middlesex, New Jersey. The term "Respondent" shall also mean corporation's officers, employees, agents, assigns, and successors.
3. The "Site" shall mean the real property (including structures and containers thereon) which is designated as Block 256, Lot 1 on the municipal tax map in the Borough of South Plainfield, Middlesex County, New Jersey which is approximately 24 acres in size.
4. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. Section 9601 et seq.
5. "Hazardous substance" shall mean any substance (or any mixture containing any substance) that falls within the definition of a "hazardous substance" as defined in Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

6. "National Contingency Plan" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated by EPA pursuant to Section 105 of CERCLA, 42 U.S.C. §9605, at 40 C.F.R. Part 300 et seq., and all amendments or modifications thereto.
 7. "Work" shall mean all activities the Respondent is required to perform pursuant to this Order, including but not limited to all activities identified in Section VII of this Order.
- B. Unless otherwise specified herein, all terms used herein shall have their ordinary meanings except that those terms defined under Section 101 of CERCLA, 42 U.S.C. Section 9601, shall have the meanings specified therein.

III. PARTIES BOUND

- A. This ORDER shall apply to and be binding upon the Respondent, its principals, officers, agents, directors, employees, assigns, and successors. No change in the ownership, corporate status, or other control of any Respondent shall alter any of that Respondent's obligations under this ORDER.
- B. The Respondent shall provide a copy of this ORDER to any prospective purchaser of the Site property and/or any successor-in-interest (who acquires a 50% or greater interest), before a controlling interest in the Respondent's assets, property rights or stock are transferred to that prospective owner or successor. The Respondent shall provide a copy of this ORDER to each contractor, sub-contractor, laboratory, or consultant retained to perform any services under this ORDER, within fifteen (15) calendar days after the effective date of this ORDER or on the date of such retainer, whichever date occurs later. The Respondent shall also provide a copy of this ORDER to each person representing the Respondent with respect to the Site or response actions conducted pursuant to this ORDER, and shall condition all contracts and subcontracts entered into hereunder upon performance of all such response actions in conformity with the terms of this ORDER. With regard to the activities undertaken pursuant to this ORDER, each contractor and subcontractor shall be deemed to be related by contract to the Respondent within the meaning of Section 107(b)(3) of CERCLA, 42 U.S.C. Section 9607(b)(3). Notwithstanding the terms of any contract, the Respondent is responsible for compliance with this ORDER and for ensuring that their contractors, subcontractors and agents comply with this ORDER, and perform all activities in accordance with this ORDER.
- C. Within fifteen (15) calendar days after the effective date of this ORDER the Respondent that owns real property comprising all or part of the Site shall record a copy or copies of this ORDER in the appropriate governmental office where land ownership and transfer records are filed or recorded, and shall ensure that the recording of this ORDER is indexed to the titles of each and every property at the Site so as to provide notice to third parties of the issuance and terms of this ORDER with respect to those properties. The Respondent shall, within twenty (20) calendar days of the effective date of this ORDER, send notice of such recording and indexing to EPA.
- D. Not later than sixty (60) calendar days prior to any transfer by the Respondent of any real property interest in any property included within the Site, the Respondent shall submit a true and correct copy of all transfer documents to EPA, and shall identify the transferee by name, principal business address and effective date of the transfer.

IV. FINDING OF FACTS

A. Site Description:

1. The Site is an active industrial park, with an estimated fifteen businesses currently occupying the on-site structures. Access to portions of the property is over an unpaved, stone/gravel roadway. A foot/bicycle path at the rear of the property appears to be used for passage from the residential area on Spicer Avenue to Front Street/Metuchen Road. With the exception of the buildings, the public has generally unrestricted access to all open areas of this Site.
2. Approximately 540 persons reside within 0.25 miles of the Site, with the nearest residential homes being located on Spicer Avenue and on the opposite side of Hamilton Boulevard, less than 200 feet from the Site.
3. Ground water is a significant source of drinking water within a four-mile radius of the Site. Based on data from January, 1994, the nearest municipal drinking water well was reported to be located 0.6 miles north and down gradient of the Site. In 1994, there were an estimated 93 drinking water wells operating within four miles of the Site. Most of these wells appear to be either down gradient or cross gradient of the Site. It is estimated that 11,077 persons are served by wells located within 0.5 miles to 1 mile.
4. The depth to ground water beneath the Site is approximately 3 to 10 feet below the surface. Shallow ground water at the Site however, may discharge to a tributary of the Bound Brook which borders the Site.
5. Soil, water and sediment samples collected at the Site contain numerous hazardous substances, including polychlorinated biphenyls ("PCBs"), polynuclear aromatic hydrocarbons ("PAHs"), arsenic, chromium, cadmium, and lead.
6. A variety of electrical components, including capacitors, coils, and transformers were discovered at various locations throughout the Site during soil sampling events, both above and below the ground surface.

B. Sampling at the Site:

1. On June 8, 1994, the U.S. EPA collected soil, sediment, and surface water samples from the Site. The following is a brief summary of the analytical data for those samples:
 - a. PCBs and lead were detected in soil at concentrations up to 1,100 mg/kg and 2,200 mg/kg, respectively. Aroclor-1254, a PCB was detected in soil at concentrations ranging from 6.9 mg/kg to 1100 mg/kg. Heavy metals were detected in the soil at maximum concentrations as follows: arsenic (25.7 mg/kg), cadmium (36.7 mg/kg), chromium (78.6 mg/l), copper (3,020 mg/kg), mercury (2.9 mg/kg), silver (26.7 mg/kg), and zinc (1,380 mg/kg).
 - b. A sediment sample collected from the stream near the rear of the property revealed the presence of Aroclor-1254 at 550 mg/kg. 1,2-dichloroethene (51 ug/kg), trichloroethene (120 ug/kg), and lead (552 mg/kg) were also detected in this same sediment sample.

- c. Aroclor-1254 was detected in surface water samples at levels up to 20 ug/l. Aroclor-1248, 1,2-dichloroethene, and trichloroethene were detected at this same location at 24 ug/l, 100 ug/l, and 2 ug/l, respectively. With respect to heavy metals, the maximum values detected in the surface water were: arsenic (15.6 ug/l), cadmium (14.5 ug/l), chromium (25.7 ug/l), copper (89.5 ug/l), lead (180 ug/l), mercury (0.23 ug/l), silver (3.8 ug/l), and zinc (994 ug/l).
2. On June 27 and 29, 1996, the U.S. EPA collected surface and subsurface soil samples from a roadway, a vacant field, and a foot/bike path on the Site. On July 16, 1996, test pits were excavated in the vacant field and additional soil samples collected. The following is a brief summary of the analytical data for the above soil samples:
 - a. The maximum Aroclor-1254 concentration (51,000 mg/kg) detected in the surface soil was collected near the northeast corner of the fenced area, where electrical and transformer parts lie exposed in a swale. Additional surface soil samples collected within the fenced area indicated the presence of Aroclor-1254 at 98 mg/kg, 270 mg/kg, and 4,700 mg/kg.
 - b. The maximum Aroclor-1254 concentration detected on the surface of the Site roadway was 340 mg/kg. The average Aroclor-1254 detected on the surface of the Site roadway was 87.5 mg/kg. The maximum concentrations of Aroclor-1254 detected just beneath the unpaved stone/gravel layer of the Site roadway, ranged from 1,000 mg/kg to 22,000 mg/kg.
 - c. Elevated levels of Aroclor-1254 (90 mg/kg to 3,000 mg/kg) were also detected at the surface, along and in the vicinity of, the foot/bike path at the rear portion of the Site. A sample collected in the floodplain of the stream, down slope from the exposed waste, contained 100 mg/kg of Aroclor-1254.
 - d. The average lead concentration detected on the surface of the Site roadway was 167.6 mg/kg. The maximum lead and cadmium concentrations on the surface of the Site roadway were 340 mg/kg and 19 mg/kg, respectively. The concentration of lead detected beneath the unpaved stone/gravel layer of the Site roadway ranged from 1,740 mg/kg to 7,460 mg/kg. Cadmium was also detected at a concentration of 373 mg/kg. Some of the highest levels of lead (1,740 mg/kg - 66,600 mg/kg) and cadmium (43 mg/kg - 271 mg/kg) were noted near the foot/bike path and the northeast corner of the fenced area, within the area where the exposed waste is present.
3. Several test pits excavated at the Site revealed stained subsurface soils, drum carcasses, electrical parts, mica-like chips, wood, and debris. Aroclor-1254 and lead were detected at concentrations as high as 1,900 mg/kg and 1,970 mg/kg, respectively, in samples collected from the test pits.
4. On October 30, 1996, the Agency for Toxic Substances and Disease Registry ("ATSDR") issued an ATSDR Record of Activity ("AROA") for this Site. In the AROA, ATSDR concluded that PCBs are present at levels of public health concern at the Site. ATSDR made the following recommendations:

- a. Conduct additional sampling to adequately characterize the Site.
- b. Prevent exposure to PCBs present in surface soil at levels of public health concern.
- c. Prevent off-site migration of PCBs in dust and soil.

C. Risk Analysis:

1. Under certain circumstances, PCBs are readily absorbed into the body. They may persist in tissues for years after exposure stops. Chemical acne, dark patches on skin, burning eyes and skin, and unusual eye discharge have been reported by all routes of exposure. Generally, onset may not occur for months. These effects may last for months. Liver damage and digestive disturbance have been reported. PCBs may impair the function of the immune system and at high levels have been shown to produce cancer and birth defects in laboratory animals. PCBs have the ability to bioaccumulate to concentrations that are toxic. A number of human studies indicate that PCBs can cross the placenta and locate in the fetus. PCBs also have the ability to concentrate in human breast milk.
2. Lead has the ability to accumulate in the body to levels which may eventually reach a point where symptoms and disability occur. Symptoms linked to excessive exposure include decreased physical fitness, fatigue, sleep disturbance, aching bones, abdominal pains and decreased appetite. Lead is a powerful systemic poison. Ingestion and inhalation of large amounts may lead to seizures, coma, and death. Long-term exposure can result in severe damage to the blood-forming organs, and the nervous, urinary and reproductive systems.
3. A screening-level ecological risk assessment was completed on June 11, 1996 by U.S. EPA. A comparison of surface water and sediment contaminant levels to available screening values indicates that contamination of stream sediments adjacent to, and apparently associated with, the Site are present at levels that have been linked to adverse impacts in benthic organisms in other freshwater systems. This risk assessment also indicates that there is a potential for acute direct toxicity impacts to wildlife associated with the aquatic habitat for cadmium, copper, lead, PAHs, and PCBs. Due to the potential for these contaminants to enter the food chain, they may have the potential to impact higher trophic level receptors. The presence in the stream of herptiles and fish, and of mammalian and avian predators in the stream corridor, indicates that the exposure pathway from stream sediments to upper trophic level consumers appears to be complete.
4. Aroclor-1254, cadmium, copper, and lead have bioaccumulative properties. The Hazard Quotient, which is the ratio of Exposure Dose of a Contaminant of Concern to Benchmark Dose, indicates that individually both Aroclor-1254 and lead possess potential for ecological risk. Though, separately, copper and cadmium at the Site do not appear to exhibit potential for ecological risk, collectively they do pose a concern.
5. The screening-level ecological risk assessment indicates that very diverse and valuable habitat exist just upstream and downstream of the Site in the form of forested and emergent wetland, floodplain, old field and meadow, and undeveloped watershed in an otherwise heavily developed region. This physical arrangement could potentially have the affect of attracting ecological receptors into the areas of

higher quality habitat, then exposing them to the contamination through either the use of the stream adjacent to the Site as a migration corridor or the transport of contaminants from adjacent to the Site to downstream habitats.

- D. EPA has incurred response costs and will likely continue to incur response costs relative to this Site.
- E. D.S.C. of Newark Enterprises, Inc. is the current owner of this Site.

V. CONCLUSIONS OF LAW

Based on the Finding of Facts set forth above, and the Administrative Record relating to this matter, EPA has determined that:

- A. The Site is a "facility" within the meaning of that term as defined in Section 101(9) of CERCLA, 42 U.S.C. §9601(9).
- B. Many of the chemicals and substances referred to in the FINDINGS section above, including among others, PCBs, which are located at or migrating from the Site, are "hazardous substances" within the meaning of that term as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).
- C. The presence of hazardous substances at the Site and the migration of hazardous substances at or from the Site, as described in the FINDINGS, above, are "releases" of a hazardous substance within the meaning of Sections 101(22) and 104(a) of CERCLA, 42 U.S.C. Sections 9601(22) and 9604(a). Each such release of each hazardous substance at and from the Site is also an "actual...release of a hazardous substance from a facility" as that phrase is used in Section 106(a) of CERCLA, 42 U.S.C. §9606(a).
- D. The actual or potential migration of hazardous substances at or from the Site, into the soil, groundwater, or surface water and sediments, adjacent to, or beneath the Site, as described in the FINDINGS, above, constitutes a "threatened release of a hazardous substance from a facility" within the meaning of Section 101(22) and 106(a) of CERCLA, 42 U.S.C. Sections 9601(22) and 9606(a). Each such actual or potential migration of a hazardous substance at or from the Site also constitutes a "substantial threat" of a release of a hazardous substance into the environment, within the meaning of Section 104(a)(1)(A) of CERCLA, 42 U.S.C. Section 9604(a)(1)(A).
- E. The Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

VI. DETERMINATIONS

Based on the finding of facts and the conclusions of law as set forth above, the Regional Administrator has determined as follows:

- A. The conditions present at the facility constitute an imminent and substantial endangerment to public health, welfare, or the environment. Factors that were considered in evaluating the conditions at the Site, as set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan, as amended, 40 C.F.R. Part 300 ("NCP"), include, but are not limited to, the following:

1. actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
 2. high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate; and
 3. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- B. The actions required by this Order are necessary to protect the public health, welfare, or the environment, and are not inconsistent with the NCP or CERCLA.
- C. The Respondent to this ORDER is liable under one or more subsections of Section 107(a) of CERCLA, 42 U.S.C. §9607(a), for all EPA response costs incurred by the Federal government relating to the Site.

VII. ORDER

Based on the foregoing FINDINGS, CONCLUSIONS and DETERMINATIONS, it is hereby ordered that the Respondent identified in the caption of this ORDER undertake response actions at the Site in accord with all of the terms, provisions and schedules stated below. The required response actions are interim measures to stabilize the Site until a permanent remedy can be implemented. It is hereby ordered that the Respondent shall perform the following response actions relating to the Site:

A. Facility Coordinator and EPA On-Scene Coordinator("OSC"):

1. A qualified Facility Coordinator, designated by the Respondent, shall be available for contact by EPA throughout all phases of the work required by this ORDER and until all the actions required by this ORDER are completed.
2. The Facility Coordinator shall be responsible for oversight of the implementation of this ORDER, including all activities required herein. The Facility Coordinator shall also be the primary contact person for communications with EPA and State technical personnel. All communications transmitted by EPA to the Facility Coordinator shall be deemed received by and shall be deemed to be notice to the Respondent who performs the actions required by this ORDER. Copies of all correspondence and writings from the Respondent to EPA shall also be directed to the Facility Coordinator.
3. The Respondent shall submit the name, title, address, and telephone number of the Facility Coordinator and a description of his or her professional experience and qualifications for this position in writing to the OSC for the Site and the state contact identified below within seven (7) calendar days of the effective date of this ORDER. The Facility Coordinator shall have sufficient technical and managerial expertise and qualifications to adequately oversee and manage all aspects of the work contemplated by this ORDER. The Facility Coordinator shall not be an attorney nor shall he or she be a counsel for the Respondent.
4. EPA reserves the right to reject any Facility Coordinator proposed by the Respondent if it judges him or her to be unqualified for that position. In that event, the Respondent shall submit to EPA the name and qualifications of a new Facility

Coordinator within five (5) calendar days of EPA's notice of rejection of Respondent's Facility Coordinator.

5. EPA has the unreviewable right to select, and, at any time, to change the OSC for the Site. If EPA changes its OSC, EPA will inform the Respondent in writing of the name, business address, and telephone number of the new OSC and/or Alternate OSC. EPA's OSC is Eric Wilson. Mr. Wilson can be reached at (908)-906-6991.
6. EPA's OSC shall have all the authority vested in an OSC by the National Contingency Plan ("NCP"), 40 C.F.R. Part 300. EPA's OSC and/or Alternate OSC shall have authority, consistent with the NCP, to halt any work required by or pursuant to this ORDER, and to take any necessary response action.

B. Written Commitment to Comply:

1. Within seven (7) calendar days of the effective date of this ORDER, Respondent shall submit to EPA a signed, unconditional and unequivocal written commitment to comply with and to perform all of the Work required under this ORDER in accordance with the schedules set forth in this ORDER and any and all attachments hereto.
2. Such written commitment shall contain, in addition, the following:
 - a. The names, addresses and telephone numbers of all general contractors, subcontractors and all other major contractors who will be performing work at the Site pursuant to the terms of this ORDER, to the extent they are known as of the date the commitment is sent to EPA, and an identification of the tasks that each will be performing at the Site;
 - b. The curriculum vitae of all non-attorney professionals who will be performing work for the Respondent under this ORDER, including all professional engineers, geologists, soil and foundation specialists, architects, civil engineers and design engineers;
3. If the Respondent fails or refuses to unequivocally and unconditionally commit to comply with this ORDER as specified in Section VII.B of this ORDER, the Respondent shall be deemed to be in violation of Section VII.B of this ORDER for such failure or refusal, and to be subject to civil penalties pursuant to Section 106(b) of CERCLA for each day thereafter that the Respondent continues to violate this provision, in addition to penalties for noncompliance with any other provision of this ORDER and liability for punitive damages pursuant to Section 107(c) of CERCLA.

C. Work to Be Performed:

1. Respondent shall perform at a minimum, the following actions:
 - a. Pave all unpaved areas used as driveways, parking areas and walkways.
 - b. Institute site controls and restrict access to areas of known PCB contamination. Site controls shall at a minimum include the installation of six-foot chain link fence and the posting of warning signs. Access to areas of known PCB contamination not addressed under subparagraph VII.C.1 (a)

OSC is Eric Wilson

above, shall be limited to personnel involved in the implementation of the tasks set forth in this Order.

- c. Implement engineering controls to limit the migration of contaminants through surface water run-off to the unnamed tributary of the Bound Brook which borders the Site.
 - d. Maintain systems installed in accordance with subparagraphs VII.C.1(a),(b) and (c) above.
- 2. All activities required by this ORDER shall be completed as soon as possible even though maximum time periods for their completion are set forth herein, but in no instance shall the Respondent's time for completion of required activities exceed the time periods stated herein. Failure to meet any time periods, schedules or requirements contained in this ORDER shall constitute violation of this ORDER.
- 3. Within fifteen (15) days of the effective date of this Order, Respondent shall submit to EPA for review and approval a detailed Site Operations Plan ("SOP"), in accordance with this Order, CERCLA, the NCP, EPA's guidance documents, other applicable federal and state laws and regulations. The SOP shall include the following:
 - a. Site Work Plan; and
 - b. Health and Safety Plan
- 4. The Site Work Plan shall include:
 - a. A detailed description of the actions to be taken and materials of construction to be used to accomplish the tasks set forth in this Order;
 - b. Maps depicting existing site conditions including: existing site structures, paved areas, fences, roadways, parking areas, and walk ways;
 - c. Maps depicting proposed fences, paving, drainage controls and warning signs;
 - d. The overall management plan, including identification of (or provisions for later advanced notification of) contractors and subcontractors and their respective responsibilities for performance of the tasks set forth in this Order. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained by the Respondent, or of Respondent's choice of themselves to do the response action. If EPA disapproves of a contractor selected by the Respondent, Respondent shall retain a different contractor or notify EPA that it will perform the response action itself within five (5) days following EPA's disapproval; and
 - e. The curricula vitae of all professionals expected to participate in the response action together with a description of the anticipated responsibilities and levels of effort of each of those professionals.

5. The Health and Safety Plan shall satisfy the requirements of 29 C.F.R. 1910.120 standards for "Hazardous Waste Operations and Emergency Response" and EPA's "Standard Operating Safety Guides", OSWER Directive 9285.1-03, June 1992.
6. EPA may either approve, disapprove or require modification of the SOP, or may require modifications thereto pursuant to Paragraph VIII.B. below. Upon its approval by EPA, the SOP shall be deemed to be incorporated into and become an enforceable part of this Order.
7. Within fifteen (15) days after EPA's approval of the SOP, Respondent shall commence the work described in the EPA-approved SOP. The work required by the SOP shall be completed within thirty (30) days after the commencement of work.
8. At the time of completion of Work required by the EPA-approved SOP, demobilization shall include sampling, if deemed necessary by EPA, and decontamination or proper disposal of protective clothing and any equipment.
9. Within thirty (30) days after completion of Work required by the EPA-approved SOP, Respondent shall submit for EPA review and approval a Site Summary Report specifically setting forth the manner in which Respondent has complied with this Order and implemented the requirements set forth in the EPA-approved SOP. The Site Summary Report shall include all appropriate documentation which substantiates, to EPA's satisfaction, Respondent's assertion that the Work required hereunder has been successfully completed in full satisfaction of this Order, including:
 - a. synopsis of all Work performed under this Order;
 - b. identification and a detailed description of all EPA-approved modifications to the SOP which occurred during Respondent's performance of the Work required under this Order;
 - ✓ c. a list of all contractors and subcontractors, utilized during the performance of the Work;
 - ✓ d. a listing of quantities, types of materials and ultimate destination of materials handled on-site or removed from Site for off-site treatment or disposal;
 - ✓ e. a summary of actual costs incurred to comply with and implement the provisions of this Order;
 - ✓ f. a sworn statement by authorized representatives of Respondent setting forth the following:

"To the best of my knowledge, after thorough investigation, I certify that the information contained in and accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

VIII. GENERAL PROVISIONS

A. Access, Document Availability, and Retention of Records:

1. Copies of all work plans, reports and any other documents required to be submitted to EPA under this ORDER shall be sent by certified mail or express mail to the following addresses:

Two (2) copies: U. S. Environmental Protection Agency
Removal Action Branch
2890 Woodbridge Avenue
Edison, New Jersey 00837
Attn.: On-Scene Coordinator for Cornell-Dubilier Electronic Site

One (1) copy: U. S. Environmental Protection Agency
Office of Regional Counsel
New Jersey Superfund Branch, 17th Floor
290 Broadway
New York, New York 10007-1866
Attn.: Attorney for Cornell-Dubilier Electronic Site
2. All documents produced by the Respondent and submitted to EPA in the course of implementing this ORDER shall be available to the public unless the Respondent claims they are confidential using the procedures described in 40 C.F.R. Part 2. If such a claim is made with regard to any of the records or any other documents produced by the Respondent or their contractors, EPA will release such documents in accordance with the procedures stated in 40 C.F.R. Part 2, Subpart B and Section 104(e)(7) of CERCLA, 42 U.S.C. §9604(e)(7). No sampling, hydrological, geological, soil chemical analyses, groundwater quality data, or information specified under Section 104(e)(7)(F)(i)-(viii) of CERCLA, relating to the Site shall be considered confidential.
3. The Respondent shall allow EPA and EPA contractors and agents to have access to all records relating to implementation of the Work under this ORDER. All such records shall be stored at a location in the State of New Jersey which is accessible to EPA officials. The Respondent shall make all such records available for any EPA official to review and copy within three days after receiving a request from EPA for access to such records. All employees and contractors of the Respondent who engage in any activity under this ORDER shall be available to and shall cooperate with EPA and EPA agents and contractors.
4. All data and information relating to the implementation of this ORDER shall be retained by the Respondent for a period of ten (10) years after the effective date of this ORDER. The Respondent shall inform the EPA OSC contact in writing within ten (10) calendar days of the effective date of this Order of the name and address of the person who will be charged with retaining these records and where they will be located during this ten (10) year period. Any and all such records are to be made available to EPA upon request during any business day throughout that period of time.
5. The Respondent shall allow unimpeded access to all areas of the Site and into all structures thereon by all EPA representatives, agents, contractors and consultants.

The Respondent shall permit such EPA representatives, agents, contractors and consultants to enter and move about the Site at will at all times and shall allow them to undertake any observations, actions or any other activities which EPA elects to undertake at the Site at its option, including but not limited to the following:

- a. Monitoring the progress of activities taking place;
 - b. Verifying any data or information submitted to EPA;
 - c. Conducting investigations relating to contamination at or near the Site;
 - d. Obtaining samples at the Site; and
 - e. Inspecting and copying records, operating logs, Respondent's compliance with this Order.
6. The Respondent shall make available to EPA as promptly as reasonably possible, the data generated by the Respondent with respect to the implementation of this Order.
 7. Nothing in this Order shall be construed to limit EPA's rights of access or rights to obtain information pursuant to applicable law.

B. EPA Review of Submissions:

1. After review of any deliverable, plan, report or other item which is required to be submitted for review and approval pursuant to this ORDER, EPA may:
 - (a) approve the submission;
 - (b) approve the submission with modifications made unilaterally by EPA;
 - (c) disapprove the submission and direct the Respondent to re-submit the document after modifying the document in accord with EPA's comments and as directed by EPA; or
 - (d) disapprove the submission for cause and assume responsibility for performing all or any part of the response action.

In the event of EPA disapproval pursuant to subsection (d), above, the Respondent shall be deemed to be in violation of the relevant provisions of this ORDER for failure to make an adequate submission beginning on the day following the date the deliverable, plan, report or other item is due and on each and every day thereafter.

2. In the event of approval or approval with unilateral modifications by EPA of any submission or re-submission pursuant to this Section VIII.B, EPA will notify the Respondent of such approval or approval with modifications, and the submission or re-submission shall be deemed final and effective the date EPA's notice of approval is signed. Following receipt of EPA's notice of approval, the Respondent shall proceed to take any action required by the plan, report, or other item, as approved or modified by EPA. EPA shall remain the final arbiter in any dispute regarding the

sufficiency or acceptability of any such plan, report or other item, and EPA may modify it unilaterally at any time by notifying the Respondent of such modification.

3. In the event that EPA disapproves any submission and directs the Respondent to re-submit such submission with modifications pursuant to Paragraph VIII.B.1(c), above, the Respondent shall modify the submission in accord with EPA's comments and as directed by EPA, and shall re-submit the modified document to EPA within ten (10) calendar days of receipt of EPA's comments or within such other time period as EPA may specify in writing. Failure to make a timely and conforming re-submission in compliance with this paragraph shall constitute a separate violation of this ORDER for each day such re-submission is late or remains deficient.
4. EPA may approve, approve with unilateral modifications, disapprove with a requirement for further modification, or disapprove any re-submission made pursuant to Paragraph VIII.B.3, above, in accordance with the procedures of this Section VIII.B, except that any EPA action in approving with unilateral modifications, disapproving, or disapproving with a requirement for further modification any such re-submission shall under no circumstances be construed as relieving the Respondent of liability for daily penalties and treble damages for failure to make a timely and conforming first re-submission pursuant to Paragraph VIII.B.3, above. Each subsequent late or deficient re-submission shall constitute a separate violation of Paragraph VIII.B.3.
5. EPA's comments pursuant to Paragraph VIII.B.1(c) and VIII.B.3, above, may require the Respondent to perform such additional investigatory work, verification sampling, evaluations, or other response action as EPA may find necessary. Any such additional investigatory work or other response action, including any necessary work plans and reports, shall be performed by the Respondent as directed by EPA and in accordance with any schedules specified by EPA. A requirement by EPA for additional investigatory work or other response action pursuant to this paragraph shall not excuse performance of any other obligation under this Section VIII.B and shall not be construed to alter in any way the Respondent's obligations to make timely and conforming re-submissions pursuant to Paragraph VIII.B.3 above.

C. Amendments and Scope of Order Generally:

1. All reports, EPA-approved documents and other writings required under the terms of this ORDER shall, upon approval by EPA, be deemed incorporated into this ORDER and may be enforced as any other provision in this ORDER.
2. No informal advice, guidance, suggestions or comments by EPA officials shall be construed to relieve the Respondent of any of their obligations under this ORDER.
3. Any and all modifications to this ORDER must be approved in a writing signed by the Regional Administrator of Region II.
4. EPA shall have sole authority to make any modifications to the work plans or schedules submitted pursuant thereto, and EPA may unilaterally make any such modifications at any time prior to the completion of all work required by this ORDER.

D. Professional Standards, Permits and Compliance with Other Laws:

1. All activities conducted pursuant to this ORDER shall be performed in accordance with prevailing professional standards.
2. All activities carried out by the Respondent pursuant to this ORDER shall be done in accordance with all applicable federal, state and local laws, regulations, ordinances and other requirements.
3. All activities conducted by the Respondent pursuant to this ORDER shall comply with the requirements of CERCLA, the NCP, and all applicable OSHA regulations for worker health and safety as found in 29 C.F.R. §1910 et seq., and elsewhere.
4. All hazardous substances, pollutants or contaminants removed from this Site pursuant to this Order shall be disposed of or treated at a facility approved by EPA's OSC and in accordance with Section 121(d)(3) of CERCLA, 42 U.S.C. Section 9621(d)(3), with the EPA "Revised Off-Site Policy," OSWER Directive 9834.11 (November 13, 1987) and EPA's Off-Site Disposal Rule codified at 40 C.F.R. 300.440, and with all other applicable federal, state and local requirements. All disposal of materials conducted by the Respondent pursuant to performing any work under this ORDER shall comply with all provisions of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq., the Toxic Substances Control Act ("TSCA"), 15 U.S.C. §2601 et seq., all regulations promulgated pursuant to both RCRA and TSCA, and all applicable state laws and regulations.
5. The Respondent shall be responsible for obtaining all necessary federal, state and local permits, licenses and other governmental and private authorizations, including access agreements, needed to carry out the work required by this ORDER, except as provided under Section 121(e) of CERCLA, 42 U.S.C. Section 9621(e).

E. Non-liability of the United States:

The United States Government and any and all agencies thereof shall not be liable for any injury or damage to any person or property resulting from any acts or omissions of any of the Respondent and any employees, contractors, or agents of the Respondent while performing any activity related to this ORDER; the United States Government and any and all agencies thereof shall not be a party to any contract entered into by the Respondent in carrying out any activity pursuant to this ORDER, and the Respondent shall not represent to anyone that the United States Government or any agency thereof is or may be a party to any such contract.

F. Noncompliance:

1. The Respondent shall use its best efforts to avoid or minimize any delay or prevention of performance of their obligations under this ORDER.
2. Failure by the Respondent to carry out any terms of this ORDER may result in EPA unilaterally taking or funding the actions required under this ORDER, pursuant to Section 104 of CERCLA, 42 U.S.C. §9604.
3. Failure by the Respondent to comply with any provision in this ORDER or any provision or schedule in any work plan or other document incorporated by reference

or attached to this ORDER in carrying out its obligations under this ORDER, shall be considered a violation of this ORDER.

4. If the Respondent violates any provision of this ORDER, EPA may elect to:
 - a. Demand that the Respondent cease work at the Site; and/or
 - b. Use federal funds to complete the work required by this ORDER; and/or
 - c. Initiate an action against the Respondent under Sections 106(b), 107(a) and/or 107(c) of CERCLA, 42 U.S.C. §§9606(b), 9607(a), and/or 9607(c), respectively; and/or
 - d. Take any other actions authorized under federal laws or regulations.
5. Nothing stated in this ORDER shall preclude EPA from taking any administrative enforcement actions, and/or any actions as it may deem necessary for any purpose including the prevention or abatement of an imminent and substantial endangerment to the public health or welfare or the environment arising at or in the vicinity of the Site.
6. If EPA incurs any response costs as a result of a violation, refusal, or failure of the Respondent to comply with any schedules, terms or provisions of this ORDER, the Respondent shall be liable pursuant to §107(c) of CERCLA for punitive damages of one dollar for each and every dollar in response costs incurred by EPA as a result of such failure to comply.
7. If the Respondent violates, refuses or fails to comply with any of the provisions or schedules set forth in this ORDER, the Respondent shall be liable pursuant to §106(b) of CERCLA for a penalty of up to \$25,000 per day for each and every day of each violation of each provision of this ORDER in addition to the punitive damages liability stated in paragraph 6, above.
8. If the Respondent violates, refuses or fails to fully implement or satisfactorily complete any or all of the requirements set forth in this ORDER or all EPA approved work plans or schedules attached hereto or incorporated herein on or before the date specified for such completion pursuant to this ORDER, the Respondent shall be liable pursuant to §106(b) of CERCLA for a civil penalty of up to \$25,000 per day for each failure for each and every day after that date until each requirement is completed by the Respondent to EPA's satisfaction.

G. Reservations of Rights:

1. Nothing contained in this ORDER shall affect the right of EPA to initiate an action for civil penalties against any entity, including the Respondent, pursuant to Section 106(b) of CERCLA, 42 U.S.C. §9606(b).
2. Nothing contained in this ORDER shall affect the right of EPA to pursue an action against any entity, including the Respondent (or any other responsible party), pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a), for recovery of any costs incurred by EPA relating to this ORDER and/or for any other response costs which have been incurred or will be incurred by the United States relating to the Site.

3. Nothing contained in this ORDER shall affect the right of EPA to enter into any Consent Decree, to issue any Consent Order or to issue any other Orders unilaterally to the Respondent (or to any other responsible parties for the Site) pursuant to CERCLA, or to initiate a judicial action to require the performance of any additional response actions which EPA determines are necessary for the Site.
4. Nothing contained in this ORDER shall act as a bar to, a release of, a satisfaction of, or a waiver of any claim or cause of action which EPA has at present or which EPA may have in the future against any entity, including the Respondent, on any matters relating to the Site.
5. Nothing contained in this ORDER shall be construed to mean that the Respondent is the only potentially responsible party with respect to the release and threatened release of hazardous substances at the Site.
6. Nothing contained in this ORDER shall affect any right, claim, interest, defense, or cause of action of EPA or the Respondent with respect to any entity which is not a party to this ORDER. Nothing in this ORDER constitutes a decision by EPA on pre-authorization or on any approval of funds under Section III(a)(2) of CERCLA, 42 U.S.C. §9611(a)(2).
7. This ORDER and all EPA-approved work plans, specifications, and other documents approved by EPA, prepared in compliance herewith, shall be enforceable pursuant to Sections 106(b) and 113(b) of CERCLA, 42 U.S.C. §9606(b) and §9613(b), respectively.
8. Nothing contained in this ORDER shall preclude the State of New Jersey or any agency or department thereof from taking or maintaining any enforcement action or litigation relating to the Site, including issuing any directive pursuant to State law relating to the Site.

H. Notification and Reporting Requirements:

1. The Respondent shall provide monthly progress reports to EPA as provided herein by the tenth (10th) day of every month following the effective date of this ORDER. At a minimum, the progress reports shall: (1) describe all activities undertaken by the Respondent pursuant to the terms of this ORDER during the month immediately preceding the date of submission of the report; (2) identify all activities which will be undertaken by the Respondent in the next month in order to comply with all terms of this ORDER; (3) identify potential delays, if any, which the Respondent foresees in completing the work required by this ORDER; (4) include all the results of sampling and tests, if any, and all other data received by the Respondent in the preceding month; and (5) provide a quantified estimate of the percentage of work which is required by the ORDER which has been completed as of the date of submission of the progress report to EPA.
2. Upon the completion of all of the work required by this ORDER, the Facility Coordinator designated by the Respondent shall notify the EPA OSC in writing by registered mail that all of the work required by this ORDER has been completed.

I. Additional Removal Actions

If EPA determines that additional removal actions not included in an approved plan are necessary to protect public health, welfare, or the environment, EPA will notify Respondent of that determination. Unless otherwise stated by EPA, within (thirty (30)) days of receipt of notice from EPA that additional removal actions are necessary to protect public health, welfare, or the environment, Respondent shall submit for approval by EPA a Work Plan for the additional removal actions. The plan shall conform to the applicable requirements of sections VII and VIII of this Order. Upon EPA's approval of the plan, Respondent shall implement the plan for additional removal actions in accordance with the provisions and schedule contained therein. This section does not alter or diminish the OSC's authority to make oral modifications to any plan or schedule.

J. Emergency Response and Notification of Release:

1. If any incidents, or change in site conditions, during the course of the Work pursuant to this Order causes or threatens to cause an release of hazardous substances from the Site or an endangerment to public health, welfare, or the environment, the Respondent shall immediately take appropriate action. The Respondent shall take these actions in accordance with all applicable provisions of this Order, including, but not limited to, the Safety Plan, in order to prevent, abate or minimize such release or endangerment caused or threatened by the release. Respondent shall also immediately notify the OSC at (908) 906-6991 or, in the event of his unavailability, shall notify the Region II Emergency 24-Hour Hot Line at (908) 548-8730 of the incident or site conditions. If Respondent fails to take action, then EPA may respond to the release or endangerment and reserve the right to pursue cost recovery.
2. In addition, in the event of any release of a hazardous substance, Respondent shall immediately notify EPA's OSC at (908) 906-6991 and the National Response Center at telephone number (800) 424-8802. Respondent(s) shall submit a written report to EPA within (seven (7)) days after each release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent to reoccurrence of such a release. This reporting requirement is in addition to, not in lieu of, reporting under CERCLA section 103(c) and section 304 of the Emergency Planning and Community Right-To-Know Act of 1986, 42 U.S.C. Sections 11001 et seq.

*Additional removals
Final Arbiter*

K. EPA as Final Arbiter:

EPA shall be the final arbiter of all disputes concerning the sufficiency of the Work to be carried out pursuant to this Order, the schedules for performance of any and all Work to be performed under this Order, any requests for modifications to the terms of this Order and all other matters relating to the performance of the Work required by this Order and the manner by which such Work is to be performed.

L. Public Participation:

The Respondent shall cooperate with EPA in providing information regarding the Work to be performed pursuant to this ORDER to the public. If requested by EPA, the Respondent shall participate in the preparation of such information for distribution to the public and in public meetings which may be held or sponsored by EPA to explain activities at or relating to the Site.

IX. NOTICE OF COMPLETION

When EPA determines, after EPA's review of the Site Summary Report, that all response actions have been fully performed in accordance with this Order, with the exception of any continuing obligations required by this Order, including subparagraphs VII.C.1(d), EPA will provide notice to the Respondent. If EPA determines that any response actions have not been completed in accordance with this Order, EPA will notify the Respondent, provide a list of the deficiencies, and require that Respondent modify the SOP to correct such deficiencies. The Respondent shall implement the modified and approved SOP and shall submit a modified Site Summary Report in accordance with the EPA notice. Failure by Respondent to implement the approved modified SOP shall be a violation of this Order.

X. ACCESS TO ADMINISTRATIVE RECORD

The Administrative Record supporting these response actions is available for review at:

U.S. EPA -Region II, Removal Records Center
2890 Woodbridge Avenue, Building 205
Edison, NJ 08837

XI. SEVERABILITY

If a court issues an order that invalidates any provision of this Order or finds that Respondent has sufficient cause not to comply with one or more provisions of this Order, Respondent shall remain bound to comply with all provisions of this Order not invalidated or determined to be subject to a sufficient cause defense by the court's order.

XII. INSURANCE

At least seven (7) days prior to commencing any on-site work under this Order, the Respondent shall secure, and shall maintain for the duration of this Order, comprehensive general liability insurance and automobile insurance with limits of one (1) million dollars, combined single limit. Within the same time period, the Respondent shall provide EPA with certificates of such insurance and a copy of each insurance policy. If the Respondent demonstrates by evidence satisfactory to EPA that any contractor or subcontractor maintains insurance equivalent to that described above, or insurance covering the same risks but in a lesser amount, then the Respondent need provide only that portion of the insurance described above which is not maintained by such contractor or subcontractor.

XIII. OPPORTUNITY TO CONFER

The Respondent may confer with EPA to discuss this ORDER, including its applicability, the FINDINGS upon which the ORDER is based, the appropriateness of any action or activity

required to be undertaken herein, or any other relevant issues or contentions which the Respondent may have with regard to this ORDER at a conference with EPA prior to the effective date of this ORDER, scheduled as noted in the transmittal letter which accompanies this ORDER. This conference is not and shall not be deemed to be an adversary proceeding or part of a proceeding to challenge this ORDER.

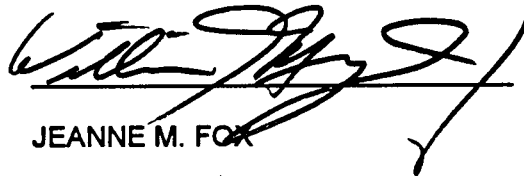
XIV. EFFECTIVE DATE

This ORDER shall become effective ten (10) calendar days after the date it is signed by the Regional Administrator as indicated below.

IT IS SO ORDERED:

Dated: 3/25/57

U.S. ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in dark ink, appearing to read "Jeanne M. Fox", is written over a horizontal line.

JEANNE M. FOX

Regional Administrator
U.S. Environmental Protection Agency
Region II

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

MAR 21 1997

DATE:

SUBJECT: Cornell-Dubilier Electronic Superfund Site

FROM:

Walter Mugdan
Regional Counsel

Richard L. Caspe

Director, Emergency and Remedial Response
Division

TO:

Jeanne Fox
Regional Administrator

Attached for your review and approval is a Unilateral Administrative Order ("Order") to be issued pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), with respect to the Cornell-Dubilier Electronic Site (the "Site") in the Borough of South Plainfield, Middlesex County, New Jersey. The Respondent is the current owner of the Site. EPA offered the Respondent an opportunity to negotiate a consent order to voluntarily perform the response actions required by the UAO, however, the Respondent failed to make a good faith offer to EPA to perform those actions.

The Site is an active industrial park. There are about fifteen businesses currently in operation at the Site. The nearest residence is located within 200 feet of the Site. There are approximately 540 residences within a quarter mile radius of the Site. Surface soil and sediment samples collected at the Site contained numerous hazardous substances, including polychlorinated biphenyls ("PCBs") and lead. PCBs and lead were detected at concentrations up to 1,100 mg/kg and 2,200 mg/kg, respectively, in soil samples taken from the Site. The following additional heavy metals were also detected in Site soil at the maximum concentrations noted for each: arsenic (25.7 mg/kg), cadmium (36.7 mg/kg), chromium (78.6 mg/l), copper (3,020 mg/kg), mercury (2.9 mg/kg), silver (26.7 mg/kg), and zinc (1,380 mg/kg).

The Order requires the Respondent to undertake measures to restrict access to areas at the Site where polychlorinated biphenyl ("PCB") contamination has been detected and to implement engineering controls to limit the migration of contaminants into an unnamed tributary which borders the Site.

The Region can issue unilateral orders under Section 106(a) of CERCLA without Headquarters' concurrence. The authority to issue an Order under Section 106(a) of CERCLA has been delegated to the Regional Administrators.

Section 106(a) of CERCLA reads in pertinent part:

In addition to any other action taken by a State or local government, when the President determines that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from a facility, he may ... after notice to the affected State, take other action under this section including, but not limited to, issuing such orders as may be necessary to protect public health and welfare and the environment.

As noted in the Order, there is sufficient basis for a determination that there are releases and/or threatened releases of hazardous substances from this facility which present an imminent and substantial endangerment to the public health and welfare and the environment within the meaning of Section 106(a) of CERCLA. On October 30, 1996, the Agency for Toxic Substances and Disease Registry ("ATSDR") issued an ATSDR Record of Activity ("AROA") for the above-referenced Site. In the AROA, the ATSDR concluded that PCBs are present at the Site at levels of public health concern. EPA further evaluated the conditions at the Site using the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan, as amended, 40 C.F.R. Part 300 (NCP) which included, but was not limited to, the following:

- a. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- b. high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate; and
- c. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

We, therefore, recommend that you sign and date the attached Order and return it to the New Jersey Superfund Branch in the Office of Regional Counsel. The signed Order then will be mailed to the Respondent.

The Order will take effect ten days after it is signed by the Regional Administrator. After it becomes effective, the Respondent will be required to submit a detailed Site Operations Plan ("SOP") to EPA for the implementation of the activities required by the Order. The SOP is subject to EPA approval.

Given the public concern about the potential health problems that may arise from the conditions at the Site, we ask that you give this matter expedited attention. The New Jersey Department of Environmental Protection has been notified that EPA intends to issue this Order. We are available if you have any questions concerning this matter.

Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

D.S.C. of Newark Enterprises, Inc.
c/o Mr. Michael Colfield, Esq.
Kummer, Knox, Naughton & Hansbury
Lincoln Center
299 Cherry Hill Road
Parsippany, NJ 07054

Re: Cornell-Dubilier Electronic Site
South Plainfield, Middlesex County, N.J.
EPA Order Index No. II-CERCLA-97-0109

Dear Counsel:

Enclosed please find a copy of the U.S. Environmental Protection Agency Administrative Order Index No. II-CERCLA-97-0109 ("the Order"). The Order, which was signed by the Regional Administrator of the U.S. Environmental Protection Agency - Region II ("EPA") on March 25, 1997, requires that your client, D.S.C. of Newark Enterprises, Inc., perform certain response actions at the Cornell-Dubilier Electronic Site ("the Site"). These actions include measures to restrict access to certain areas of the Site and to implement certain engineering controls at the Site.

This is to inform you that D.S.C. of Newark Enterprises, Inc., your client and the Respondent to the Order, will have an opportunity to confer with EPA officials concerning the Order, on **April 3, 1997 at 2:00 PM** in conference room 1721 on the 17th floor of the EPA office located at 290 Broadway, New York, New York.

At the conference, the Respondent may discuss the Order, including its applicability, the Findings upon which the Order is based, the appropriateness of any action or activity required to be undertaken under the Order, or any other relevant issues or contentions which Respondents may have with regard to the Order. However, the conference is not and shall not be deemed to be an adversary proceeding or part of a proceeding to challenge the Order.

Please call me at (212) 637-3148 if you have any questions regarding the Order or any requirements of the Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Muthu S. Sundram".

Muthu S. Sundram, Esq.
Assistant Regional Counsel
New Jersey Superfund Branch

encl.
bcc: Eric Wilson, RAB (w/encl.)

SPECIAL

U.S. ENVIRONMENTAL PROTECTION
AGENCY

EPA FORM 1320-8 (4-78)